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Counsel for PNC Bank, National Association

## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

IN RE:

NEIGHBORHOOD HEALTH SERVICES **CORPORATION** 

Chapter 11

Case No. 15-10277-VFP Honorable Vincent F. Papalia

Debtors.

457 Haddonfield Road, Suite 700 Cherry Hill, New Jersey 08002 Telephone: (856) 675-1900

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PLEASE TAKE FURTHER NOTICE that, by submitting this notice and/or any subsequent appearance, pleading, claim or suit, PNC Bank is not waiving and hereby expressly preserves its right to: (i) have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) a trial by jury in any proceeding so triable in this case or in any related case, controversy or proceeding; (iii) have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; and/or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which it is or may be entitled under any agreement, in equity and/or other applicable law.

Respectfully submitted,

Dated: January 9, 2015

By: /s/ Kevin Huang
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